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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

VICTOR MANUEL RIBAS,)	
)	
)	
Plaintiff,)	
)	C N 404 0000 CDM
V.)	Case No. 4:24-cv-00632-SPM
)	
MEGAN BESLER,)	
)	
)	
Defendant.)	

MOTION TO ENFORCE SETTLEMENT

COMES NOW, Plaintiff, Victor Ribas, by and through his undersigned counsel, and in support of Motion to Enforce Settlement, states as follows:

- 1. The parties completed Mediation before the Honorable Thomas Prebil on December 11, 2024 from 1pm to 5pm.
- 2. The parties reached an understanding as to material terms and conditions during the mediation.
- 3. A dispute has arisen however as to whether a liquidated damages provision agreed to during the mediation was mutual or unilateral which has resulted in the parties reaching an impasse in settling this matter finally.
- 4. The parties may benefit in returning to settle this final term with the mediator, Thomas Prebil, or the Court may want to consider the issue with briefing, argument of, or conference with the parties.
- 5. The undersigned files this Motion to bring the issue to the Court's attention and for input.

WHEREFORE Plaintiff requests an Order of the Court to direct enforcement of the settlement and for such additional terms as are just and proper under the circumstances.

GOLDSON HOEKEL, LLC

/s/ Marshall R. Hoekel
Marshall R. Hoekel, #40396MO
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Attorneys for Plaintiff
Victor Ribas

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served upon all parties of record by operation of this Court's Electronic Filing System on this 14th day of February 2025.

/s/ Marshall R. Hoekel

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

VICTOR MANUEL RIBAS,)	
Plaintiff, v. MEGAN BESLER,		Case No. 4:24-cv-00632-SPM
Defendant.)	
	ORD	<u>ER</u>
Plaintiff is hereby GRANT	ED and ex	tension of time up to and including
January 13, 2025 within which to	file Media	ator's Compliance Report.
SO ORDERED:		
UNITED STATES MAGISTRATE	E JUDGE	
Dated:		